

# EXHIBIT A

CASE NO. 5:22-cv-68-BO

V.

Case 5:22-cv-00068-BO Document 150-2 Filed 01/09/23 Page 2 of 8

responses as additional information may be found or is made available, as required by Rule 26 of the Federal Rules of Civil Procedure.

#### DEFINITIONS & INSTRUCTIONS

1. “Document” means any printed, typewritten, handwritten, or otherwise recorded matter of whatever character and all drafts of any such recorded matter, including, but not limited to, letters, booklets, certificates of title, forms, memoranda, telegrams, notes, catalogues, brochures, diaries, reports, drawings, charts, facsimiles, models, agreements, contracts, minutes, calendars, interoffice communications, intraoffice communications, electronic mails, attachments to electronic mails, electronic files, computer records, statements, announcements, photographs, audio or video tape recordings, motion pictures and any carbon, photographic, or electronic copies of any such material.

2. “Date,” when used herein, shall include the day, month, and year of the occurrence to which the Interrogatory refers. If any of the information referred to above is unavailable, so state, and give as much information as possible to identify the period of the occurrence.

3. When used herein, plural terms shall include the singular and singular terms shall include the plural.

4. When used herein, conjunctive terms (e.g., “and”) shall include the disjunctive (e.g., “or”) and disjunctive terms shall include the conjunctive.

5. To the extent any communications or other documents may be covered by the attorney-client privilege or work-product doctrine, please produce a privilege log of such communications and documents.

### INTERROGATORIES

1. Describe every complaint, or any other information, that Emancipate NC, Inc. has received from January 1, 2014, to the present that relates to the execution of a search warrant by the Raleigh Police Department's Selective Enforcement Unit ("SEU"), or that otherwise relates to the SEU's entry into a home, including:

- (a) The source of the complaint or other information;
- (b) The date the complaint was made or information provided to Emancipate NC, Inc.;
- (c) The contents of the complaint or information; and
- (d) Any and all actions taken by Emancipate NC, Inc. as a result of the complaint or information received.

#### **RESPONSE:**

2. Identify all financial resources that Emancipate NC, Inc. spent, specifically in connection with responding to complaints or information received that are identified in response to Interrogatory No. 1.

#### **RESPONSE:**

3. Identify each and every matter that Emancipate NC, Inc. was not able to address because it allegedly has “been forced to divert its resources from other aspects of [its] work, and other parts of the state, to attend to problems related to No Knock and Quick Knock warrant executions by RPD.”

**RESPONSE:**

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents that relate to the complaints and information that are responsive to Interrogatory No. 1.

**RESPONSE:**

2. Produce all documents that relate to the matters that are responsive to Interrogatory No. 3.

**RESPONSE:**

3. Produce any other documents that relate to Emancipate NC, Inc.’s allegation that it has “been forced to divert its resources from other aspects of [its] work, and other parts of the state, to attend to problems related to No Knock and Quick Knock warrant executions by RPD.”

**RESPONSE:**

4. Produce all documents, including communications, that relate to Emancipate NC, Inc.'s budgets from the years 2014 to the present.

**RESPONSE:**

5. Produce all non-privileged documents, including communications involving Emancipate NC, Inc. or its employees or agents, that relate to the Raleigh Police Department's execution of a search warrant at 1628B Burgundy Street on May 21, 2020.

**RESPONSE:**

6. Produce all non-privileged documents, including communications involving Emancipate NC, Inc. or its employees or agents, that relate to the conduct of Dennis Leon Williams, Jr. (a.k.a. Aspirin).

**RESPONSE:**

7. Produce all non-privileged communications between Emancipate NC, Inc. and any individual plaintiff or plaintiffs in this lawsuit.

**RESPONSE:**

This the 23rd day of November 2022.

/s/ Leslie C. Packer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 23, 2022, the foregoing document was served via electronic mail to all counsel of record as listed below:

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